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*Craig Madison*  
Attorney for Applicant

PATENT  
Docket No. 3000.2.14

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants: Bleizeffer et al.

Serial No.: 09/482,598

Filed: January 13, 2000

For: SYSTEM AND METHOD FOR FILTERING  
QUERY STATEMENTS FROM MULTIPLE  
PLANS AND PACKAGES ACCORDING TO  
USER-DEFINED FILTERS OF QUERY  
EXPLAIN DATA

Examiner: Robinson, Greta Lee

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RESPONSE TO OFFICE ACTION

Assistant Commissioner for Patents  
Washington, D.C. 20231

Dear Sir:

At the time of the Office Action mailed June 5, 2000, claims 1-41 were pending in the above-referenced application. In the Office Action, the Examiner objected to the drawings. In addition, the Examiner rejected claims 1, 5-9, 14, 18-22, 28, and 32-36 under 35 U.S.C. § 112, second paragraph, and rejected claims 1-41 under 35 U.S.C. § 103(a). In view of the following remarks, reconsideration and allowance of claims 1-41 are respectfully requested.

### Declaration

A newly executed declaration in compliance with 37 CFR 1.67(a) is submitted with this Response.

### Drawings

The Examiner objected to the drawings. Specifically, the Examiner stated that “a descriptive label is need[ed] for the following elements: Figure 1 elements 18, 12, 14, and 36.” However, Applicants respectfully submit that elements 18, 12, 14, and 36 are labeled in Figure 1. Accordingly, Applicants respectfully request withdrawal of the objection.

### Rejection of Claims 5-9, 18-22, 32-36 Under 35 U.S.C. § 112, Second Paragraph

The Examiner rejected claims 5-9, 18-22, and 32-36 under 35 U.S.C. § 112, second paragraph, as being indefinite. This rejection is respectfully traversed.

Claims 5, 18, and 32 each recite: “wherein at least one group comprises a package, each package corresponding to one application program posing queries to the database.” The Examiner has taken the position that this limitation is “vague and/or unclear.” Applicant respectfully disagrees. As stated in the specification, a “package is a collection of query statements found in a single application program.” Specification, page 4, lines 14-15. Thus, claims 5, 18, and 32 simply specify that “at least one group” of query statements is “found in a single application program.” Accordingly, Applicant respectfully submits that claims 5, 18, and 32 satisfy 35 U.S.C. § 112, second paragraph, and requests withdrawal of the rejection.

Claims 6-9, 19-22, and 33-36 were rejected based on dependency. In light of the above arguments with respect to claims 5, 18, and 32, Applicant requests withdrawal of the rejection.

### Rejection of Claims 1, 14, and 28 Under 35 U.S.C. § 112, Second Paragraph

The Examiner rejected claims 1, 14, and 28 under 35 U.S.C. § 112, second paragraph, as being indefinite. This rejection is respectfully traversed.

The Examiner has taken the position that “the filtering criteria” limitation in claims 1, 14, and 28 lacks antecedent basis. Applicant respectfully disagrees. The limitation “the filtering criteria” refers to the “user-specified filtering criteria” recited earlier in each of these claims. For example, claim 1 recites, in pertinent part:

...at least one filtering module configured to receive one or more user-specified filtering criteria directed to a subset of the identification data and apply the filtering criteria....

Similarly, claims 14 and 28 recite, in pertinent part:

...receiving one or more user-specified filtering criteria directed to a subset of the identification data; and  
applying the filtering criteria to selectively exclude those of the plurality of groups not satisfying the filtering criteria.

Accordingly, Applicant respectfully submits that claims 1, 14, and 28 satisfy 35 U.S.C. § 112, second paragraph, and requests withdrawal of the rejection.

#### Rejection of Claims 1-41 Under 35 U.S.C. § 103(a) Over VanderDrift in View of Touma

##### *Background*

A query statement specifies data to be retrieved from a database. An example of a single query statement is shown in Figure 4 of the present application. Typically, a database is associated with a plurality of query statements. That is, a plurality of query statements may be used to query a database.

A plurality of query statements may be organized into one or more groups. For example, a “package is a collection of query statements found in a single application program. A plan is also a collection of query statements, but may include statements from one or more application programs.” Specification, page 4, lines 14-16.

Users may wish to analyze the performance of one or more query statements associated with a database. Analyzing the performance of a particular query statement may involve selecting a group of query statements that contains the query statement to be analyzed. Some databases, particularly large commercial databases, may be associated with a large number of groups of query statements. For example, a large number of packages and/or plans may be associated with a database. Consequently, it may be difficult for a user to locate and select a particular group of query statements from the groups of query statements associated with the database.

*Claims 1, 14, and 28*

Claims 1, 14 and 28 recite, in pertinent part, receiving “one or more user-specified filtering criteria directed to a subset of the identification data.” The “identification data” is associated with “a plurality of groups of query statements.” Examples of the “identification data” may include “owner data, name data, collection ID data, and version data.” *See* claims 4, 16, and 30. Because the “user-specified filtering criteria” is “directed to a subset of the identification data,” and because the “identification data” describes the “groups of query statements,” the claimed invention allows a user to easily locate and select one or more groups of query statements from “a plurality of groups of query statements.”

VanderDrift relates generally to a system “for dynamically displaying, entering, and updating a database.” VanderDrift, col. 3, lines 48-49. Figure 19B in VanderDrift illustrates a dynamic document 20. “Dynamic Documents (DD) are used to display data base information to the user. ... The user can define ... filters for each DD.” VanderDrift, col. 12, line 63 - col. 13, line 2. Filters “represent the manipulation upon the data that [a] user wants to perform.” VanderDrift, col. 7, lines 13-16.

The filters disclosed in VanderDrift, however, are not “directed to ... identification data” that is associated with “a plurality of groups of query statements,” as recited in claim 14. Stated another way, VanderDrift does not disclose that the filters are designed to exclude some “groups of query statements” from a “plurality of groups of query statements.” Indeed, the Applicant cannot find, and the Examiner did not point out, any portion of VanderDrift which describes “identification data” associated with even a single “query statement.”

Touma does not overcome the deficiencies of VanderDrift. Touma discloses a “graphical user interface ... for graphically specifying data items and data computations to be performed on the data.” Touma, col. 2, line 66 - col. 3, line 1. One of the data items disclosed in Touma is a group. A “group is automatically created when a query is created.... For example, a group is created when a query is created to select department number and employee name from an employee table.” Touma, col. 7, lines 1, 15-17. Thus, in Touma the term “group” is used to describe the data that results from execution of one or more query statements. Touma also discloses a “group manager 412 ... [which] ensures that the data described in the data model are properly ... filtered....” Touma, col. 13, line 65 - col. 14, line 1.

Like VanderDrift, however, the filters disclosed in Touma are not “directed to ... identification data” that is associated with “a plurality of groups of query statements,” as recited in claim 14. Indeed, the Applicant cannot find, and the Examiner did not point out, any portion of Touma which describes “identification data” associated with even a single “query statement.”

“To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art.” MPEP § 2143.03. However, neither VanderDrift nor Touma, alone or in combination, teach or suggest receiving “user-specified filtering criteria directed to ... identification data” that is associated with “a plurality of groups of query statements,” as recited in claims 1, 14, and 28. Accordingly, Applicant respectfully submits that these claims are patentably distinct from the cited references. In addition, claims 2-13 depend directly or indirectly from claim 1, claims 15-28 depend directly or indirectly from claim 14, and claims 29-41 depend directly or indirectly from claim 28. Thus, Applicants respectfully submit that these dependent claims are patentably distinct from the cited references for at least the same reasons.

#### *Claims 3, 15, and 29*

Claim 3 depends from claim 1, claim 15 depends from claim 14, and claim 29 depends from claim 28. Thus, Applicants respectfully submit that claims 3, 15, and 29 are patentably distinct from the cited references for the reasons described above.

In addition, claims 3, 15, and 29 recite, in pertinent part, “user-defined filters of query explain data.” “Query explain data” is data which “assist[s] the user in analyzing and improving the performance of [query] statements.” Specification, page 3, lines 18-19. “Query explain data” may include access path data and statement cost data. Access path data associated with a query statement may include “[t]he set of steps created by the RDBMS for executing the ... statement[.]” Specification, page 2, lines 25-26. Statement cost data for a query statement may include “the cost for executing [the] ... statement.” Specification, page 3, lines 6-7.

Neither VanderDrift nor Touma, alone or in combination, teach or suggest “user-defined filters of query explain data,” as recited in claim 15. Indeed, neither VanderDrift nor Touma have anything to do with analyzing or improving the performance of query statements.

The passages cited by the Examiner are not to the contrary. For example, the Examiner cites a portion of VanderDrift which states:

When a user specifies the MRT on which to work, the user can specify either a new or existing version. ... The present invention is able to select the proper version records because the SQL statement which fetches these records includes a filter to select only the version(s) the user specified.

VanderDrift, col. 7, lines 20-22, 51-54. The Examiner also cites another portion of VanderDrift which states:

The user defines as many filters as he/she wishes and then activates and deactivates them whenever he/she wants. ... The user specifies which filters should be part of the fetch. ... The user can also indicate if the filter is for just temporarily hiding the data or for deleting the data.

VanderDrift, col. 12, lines 9-17. However, these portions of VanderDrift merely disclose filters which may be used to exclude some records in a database. Applicants respectfully point out that a filter is not “query explain data.” Rather, a filter is a type of query statement. As described previously, “query explain data” is data which “assist[s] the user in analyzing and improving the performance of [query] statements.” Specification, page 3, lines 18-19.

Because neither VanderDrift nor Touma teach or suggest “user-defined filters of query explain data,” Applicants respectfully submit that this is an additional reason why claims 3, 15, and 29 are patentably distinct from the cited references.

In view of the foregoing, claims 1-41 are patentably distinct over the cited references.  
Reconsideration and allowance of claims 1-41 are respectfully requested.

If there are any remaining issues preventing allowance of the pending claims that may be clarified by telephone, the Examiner is requested to call the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Craig J. Madson", written over a horizontal line.

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Date: September 5, 2002

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